# **Economic Commission for Europe**

**Inland Transport Committee** 

## **Working Party on the Transport of Dangerous Goods**

7 September 2010

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods Geneva, 13-17 September 2010
Item 5 (b) of the provisional agenda
Proposals for amendments to RID/ADR/ADN: new proposals

Proposal for allowing large sign  $N^{\circ}$  2.1 (ADR 5.2.2.2.2) to be placed on 3 sides of the truck/trailer transporting LPG cylinders (UN1965), instead of labelling each cylinder individually, when returning from customers to the filling plant.

## Transmitted by Belgium and AEGPL

#### Introduction

- 1. Cylinders with LPG (UN1965), when transported from the filling plant to main distributors, are placed on special pallets ( $\pm$  35 cylinders per pallet, for medium size cylinders). On a trailer/truck, up to 4 of these pallets are stacked on each other and the total number of cylinders transported in a single load can go from 600 up to 1.000 cylinders.
- 2. Every cylinder coming from the filling plant and being transported for delivery to the end customer is labelled with a small label of model 2.1, as mentioned in chapter 5.2.
- 3. This label can be separately printed on or affixed to the cylinder, but in most cases it is printed on the information sheet required by the "Packaging and labelling of dangerous substances and preparations directive".
- 4. No other goods are transported together with these cylinders.
- 5. Distribution is done in a full-to-empty swapping system.
- 6. Many customers remove the label of model 2.1, or the information sheet, immediately after having received the cylinder for use. Therefore, the majority of the empty uncleaned cylinders is no longer correctly labelled when returned to the filling plant.
- 7. It is almost impossible to check the presence of the label on each empty uncleaned cylinder and to rectify the many shortcomings.



<sup>\*</sup> Note by the secretariat: This proposal by the Government of Belgium and AEGPL was received before the deadline but was not processed due to misunderstandings within the secretariat.

- 8. It is therefore proposed to authorize the carriage of empty uncleaned pressure receptacles for gases of UN 1965 without labels, if the vehicle is placarded with placards corresponding to model  $N^{\circ}$  2.1 that carry the inscription "UN 1965" in order to facilitate the identification of the uniform load.
- 9. This alternative means of identification is only to be allowed for the abovementioned empty uncleaned pressure receptacles. Pressure receptacles filled with gases of UN 1965 are the only other goods allowed in vehicles carrying these placards.
- 10. Each filled cylinder has to be labelled correctly when carried on a vehicle placarded as described above.

# **Proposals**

- 11. Add the following § in 5.2.2.2.1.2:
  - "Empty uncleaned pressure receptacles for gases of UN 1965 may be carried without labels if the placards and marking according to 5.3.1.5.3 are present."
- 12. Add the following § in 5.3.1.5:
  - "5.3.1.5.3. For vehicles carrying empty uncleaned pressure receptacles without labels and having contained a gas of UN 1965, a placard corresponding to model N° 2.1 and carrying in its lower half the inscription "UN 1965" shall be affixed to both sides and at the rear of the vehicle.

## **Justification**

13. This simple change will bring effective support to the inspection and emergency services and ensure that correct information on LPG cylinders is given.

# **Safety**

14. The effect on safety is positive as emergency services will have clear and better visibility on the large labels + UN number of the product.

# **Feasibility**

15. Easy implementation.

# **Transitional period**

16. Not necessary.

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